Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of	)	
	)	
Telephone Number Portability	)	CC Docket No. 95-116
	)	RM 8535
	)	

NYNEX PETITION FOR RECONSIDERATION AND CLARIFICATION

The NYNEX Telephone Companies

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Their Attorney

Dated: August 26, 1996

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SUMMARY

NYNEX files this Petition for Reconsideration and Clarification of selected aspects of the FCC's First Report and Order ("Order") released July 2, 1996, in this number portability proceeding.

Section 251(b)(2) of the Communications Act, added by the Telecommunications Act of 1996 (the "Act"), requires local exchange carriers "to provide, to the extent technically feasible, number portability in accordance with requirements prescribed by the Commission." The Order has promulgated rules implementing that Congressional directive. The mandate of establishing long-term number (service provider) portability is sweeping. All LECs as well as cellular, broadband PCS and covered SMR providers must provide number portability, and the obligation covers incumbents as well as new entrants. Further, "[a]s [the Commission] concluded in the [Order], and as Congress has determined in the 1996 Act, number portability will benefit all telecommunications carriers and users of telecommunications services through increased competition." (Docket No. 95-116 FNPRM ¶ 213.)

In the Order, the Commission establishes performance criteria that must be met by any long-term number portability method selected by a LEC. The Commission also establishes a specific deployment schedule for LEC implementation of long-term number portability. The Commission requires all LECs to begin to implement a long-term service provider portability solution that meets the Commission's performance criteria in the 100 largest Metropolitan Statistical Areas ("MSAs") no later than October 1, 1997, and to complete deployment in those MSAs by December 31, 1998, in accordance with a phased schedule set forth in the Order.

As a leader in opening its markets to competition, NYNEX commends the FCC's affirmative efforts to introduce competition. The FCC has recognized the importance of number portability to the industry and has taken actions to ensure number portability is introduced in a timely manner. The FCC has given the industry an aggressive deployment schedule to accomplish this goal. NYNEX will take all reasonable steps in its power to meet this schedule. However, many aspects of implementing number portability are beyond NYNEX's control. To facilitate timely deployment and ensure network reliability, NYNEX recommends the FCC take several steps on reconsideration and clarification to further support its actions in the Number Portability Order.

The Commission should expeditiously reconsider and clarify its Number Portability Order to allow the Query On Release method on an intra-network basis because its use will facilitate NYNEX's ability to meet the deployment schedule while safeguarding network reliability. Additionally, the Commission should take the following actions with respect to factors beyond NYNEX's control in the deployment of number portability: hold switch vendors accountable; establish the NANC or supporting alternatives; and expedite the Illinois field test and/or accept the results of field tests in other areas utilizing the same criteria as the Illinois field test. Finally, the Commission should define more specifically the request process for smaller areas after number portability is deployed in the top 100 MSAs.

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NYNEX PETITION FOR RECONSIDERATION AND CLARIFICATION

I. INTRODUCTION

The NYNEX Telephone Companies[1] ("NYNEX") file this Petition for Reconsideration and Clarification of selected aspects of the FCC's First Report and Order ("Order") released July 2, 1996, in the above-captioned matter.

Section 251(b)(2) of the Communications Act, added by the Telecommunications Act of 1996 (the "Act"), requires local exchange carriers "to provide, to the extent technically feasible, number portability in accordance with requirements prescribed by the Commission." The Order has promulgated rules implementing that Congressional directive. The mandate of establishing long-term number (service provider) portability is sweeping. All LECs as well as cellular, broadband PCS and covered SMR providers must provide number portability, and the obligation covers incumbents as well as new entrants.[2] Further, "[a]s [the Commission] concluded in the

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[1] New England Telephone and Telegraph Company and New York Telephone Company.

[2] See Order ¶¶ 2-4.

[Order], and as Congress has determined in the 1996 Act, number portability will benefit all telecommunications carriers and users of telecommunications services through increased competition."[3]

In the Order, the Commission establishes performance criteria that must be met by any long-term number portability method selected by a LEC. The Commission also establishes a specific deployment schedule for LEC implementation of long-term number portability. The Commission requires all LECs to begin to implement a long-term service provider portability solution that meets the Commission's performance criteria in the 100 largest Metropolitan Statistical Areas ("MSAs") no later than October 1, 1997, and to complete deployment in those MSAs by December 31, 1998, in accordance with a phased schedule set forth in the Order.[4]

As a leader in opening its markets to competition, NYNEX commends the FCC's affirmative efforts to introduce competition. The FCC has recognized the importance of number portability to the industry and has taken actions to ensure number portability is introduced in a timely manner. The FCC has given the industry an aggressive deployment schedule to accomplish this goal.[5] NYNEX will take all reasonable steps in its power to meet this schedule. However, many aspects of implementing number portability are beyond NYNEX's control. To facilitate timely deployment and ensure network reliability, NYNEX recommends the FCC take

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3 Docket 95-116 Further Notice of Proposed Rulemaking released July 2, 1996 (accompanying the Order), ¶ 213.

4 See Order ¶¶ 3, 74-85, Appendix B, Appendix F.

5 From this perspective, NYNEX agrees with the U S WEST Ex Parte of August 7, 1996 that argued the FCC's deployment schedule should be the determining plan in moving forward as opposed to any State activities that may attempt to impose additional obligations before the top 100 MSAs are done.

the following steps on reconsideration and clarification to further support its actions in the Number Portability Order.

II. QUERY ON RELEASE ("QOR") SHOULD BE PERMITTED ON AN INTRA-NETWORK BASIS

As discussed below, the FCC should reconsider its Order so as to permit carriers including NYNEX to implement QOR on an intra-network basis, i.e., for calls originated by NYNEX customers to telephone numbers in NXX codes assigned to NYNEX, or to other consenting carriers.[6] This will simplify implementation of long-term number portability, and thereby assist NYNEX in meeting the deployment dates and safeguarding network reliability.

By way of background, the FCC identifies proposed methods for providing service provider portability that use databases containing the customer routing information necessary to route telephone calls to the proper terminating locations:[7] These methods depend on Intelligent Network ("IN") or Advanced Intelligent Network ("AIN") capabilities. AT&T has proposed a Location Routing Number ("LRN") method. Essentially, LRN assigns a unique 10-digit telephone number to each switch in a defined geographic area. The location number serves as a network address. Carriers routing telephone calls to customers that have transferred their telephone numbers from one carrier to another perform a database query to obtain the location routing number that corresponds to the dialed telephone number. The database query is performed for all calls to NXXs from which at least one number has been ported, even for calls

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[6] The Commission rejected the use of QOR, in part, because the Commission believed QOR's use required interconnecting carriers to deploy QOR capabilities as well. Order ¶¶ 53-54. This is not true. QOR can be deployed on an intra-network basis only while still achieving the benefits QOR can deliver.

[7] Order ¶ 13.

to non-ported customers. The carrier then would route the call to the new carrier based on the location routing number.

As also noted by the Commission:[8] Pacific Bell has proposed a triggering mechanism which operates in conjunction with the addressing scheme used by LRN.[9] This mechanism, called Query On Release ("QOR") or "Look Ahead," determines under what circumstances a database query is performed. Under QOR, the signaling used to set up a telephone call is routed to the end office switch to which a dialed telephone number was originally assigned (the release switch), i.e., according to the NPA-NXX of the dialed number. If the dialed number has been transferred to another carrier's switch, the previous switch in the call path queries the database to obtain the routing information. The call is then completed to the new carrier's switch.

The Commission states that QOR does not meet the Commission's performance criteria and is unacceptable.[10] For reasons set forth below, the Commission on reconsideration should allow QOR to be implemented on an intra-network basis.

At the outset, it should be noted that the Commission does not find that QOR will result in significant cost savings.[11] However, significant cost savings can be realized from QOR. The exact quantification is subject to change since, among other reasons, NYNEX's switch vendors are not sure yet what will and will not be required in their switches. These requirements may be different with and without QOR. However, preliminary (and conservative) estimates are $50

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8 Order ¶ 17.

9 Similar to the discussion infra, Pacific Bell sets forth important benefits QOR will provide in section I.D. of its petition being filed today in this matter.

10 See Order ¶¶ 53-56.

11 Order ¶ 54.

million in up-front savings from QOR, $25 million over five years (without taking the time value of money into account) assuming 30% porting of customers.[12] A great benefit of QOR is that, since queries are only performed on ported numbers, the network can be grown with demand. That is, as the percentage of ported customers increases, NYNEX would add signaling and database capacity. If LRN is used without QOR, then NYNEX has to design the network for the expected peak amount of signaling activity. This creates a scenario where NYNEX has to design its network for maximum demand up front, and also increases the possibility of stranded investment since the number of calls traversing NYNEX's network and thus needing to be queried is expected to drop as customers port from NYNEX.

With QOR, the complexity of deploying number portability is decreased. For example, the number of SCP pairs needed may drop from approximately 7 under LRN, to only 2 with the additional use of QOR. Less signaling infrastructure would also be required, i.e., fewer STPs, signaling links, etc. Decreasing the complexity increases the ability and likelihood of meeting the installation and deployment dates. Also, if the volume of signaling traffic is increased gradually as QOR calls for, the potential negative impact on network reliability is decreased. With the use of LRN by itself, the volume of queries, because every call is queried, immediately increases by multiples on the current load. Additionally, the industry has never introduced a service that depends on making a query to an external database for every call. On top of this,

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[12] NYNEX notes that the primary opponents of QOR have been, to date, AT&T and MCI. As interexchange carriers, they are expected to initially enter the local exchange marketplace through use of the incumbent's facilities, either through resale or use of unbundled network elements. Thus they may not fully experience the savings QOR can provide. However, they may have an interest in complicating the introduction of number portability as a means of potentially delaying NYNEX's participation in the in-region interLATA business.

under the Commission's deployment schedule, NYNEX will have to introduce a new network capability in its largest MSA (New York) without the opportunity to effectively test it in the field. Finally, NYNEX expects its switch vendors will be able to deliver QOR in time frames that will not delay the implementation of number portability.

Furthermore, LRN without QOR is a very uncertain alternative where the industry will be setting up networks of number portability databases upon which each and every call will depend. This architecture will not have received significant "testing" nor does much history exist with such extensive use of databases for call completion. The impact on the signaling network is not yet definitively understood but extensive redesign of the network is anticipated.

The Commission observes that QOR treats ported and non-ported numbers differently, resulting in longer post-dial delay.[13] However, the Commission's observation does not provide a sound basis for rejecting QOR. Importantly, any increased call set-up time is not experienced by the ported customer, i.e., the customer changing carriers. That customer's quality of service is dependent on the network it changes to. Any increased set-up time is experienced by the originating customers attempting to call the "ported" customer. Furthermore, calls in the network receive varying degrees of post-dial delay ("PDD" or call set-up time). The amount of time is not uniform, even for two calls taking the same path. The FCC recognized this in its 800 Service proceeding where it recommended that the PDD experienced by calls meet a mean of 2.5 seconds, not an absolute number for all calls.[14] NYNEX would expect any additional call set-up time resulting from QOR to be far below that 2.5 number, i.e., in the vicinity of 0.5 seconds. This is an imperceptible period of time.

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[13] Order ¶¶ 53-54.

[14] Provision Of Access For 800 Service, 6 FCC Rcd 5421 (1991).

III. THE COMMISSION SHOULD PROVIDE RECONSIDERATION/ CLARIFICATION REGARDING FACTORS BEYOND NYNEX's CONTROL THAT MAY AFFECT ITS ABILITY TO MEET THE DEPLOYMENT SCHEDULE

A. Switch Vendor Accountability

The Commission has laid out a very ambitious deployment schedule for long-term number portability. The Commission has ordered LECs operating in the 100 largest MSAs to complete scheduled implementation of service provider portability during the period October 1, 1997 to December 31, 1998.[15] The Commission notes that:

> in establishing this schedule, we have relied upon representations of switch vendors concerning the dates by which the necessary switching software will be generally available. As a result, our deployment schedule depends directly upon the accuracy of those estimates and the absence of any significant technical problems in deployment.[16]

The Commission goes on to state its "expect[ation] that the industry will work together to resolve any outstanding issues...," and to set forth a process whereby carriers can seek from the Chief, Common Carrier Bureau limited waivers or stays of the implementation schedule.[17]

Given that the Order places the onus on carriers to comply with the deployment schedule, and the carriers' dependence upon switch vendors, the Commission should clarify its Order to indicate the Commission will take all reasonable steps within its powers to ensure switch vendors

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[15] Order ¶ 77.

[16] Order ¶ 78.

[17] Order ¶¶ 78, 85.

support the schedule. Also, the Bureau and Commission should grant waivers or stays needed because of switch vendors' activities.[18]

The FCC should hold the switch vendors accountable in the process of implementing number portability. The FCC relied on the representations of the switch vendors, especially Lucent Technologies, Inc., to develop the initial deployment plan for the top 100 MSAs. However, the FCC does not directly regulate switch vendors. Furthermore, the vendors committed to technology that does not yet exist; therefore the General Availability dates are premature and subject to change.[19] Simply put, the vendors do not have all the answers yet as to what will be required for their equipment. Additionally, under the six month request process following deployment in the top 100 MSAs,[20] switch vendors will be required to install number portability capabilities. Thus, they will need to be able to provide hardware and software on a quick turnaround. The switch vendors need to deliver for the number portability schedule to be met but no penalties exist for their failure to meet these commitments.

The switch vendors are currently unable to meet the orders for new equipment installations NYNEX is sending them, mostly in relation to ISDN.[21] The work effort for number

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[18] The Order has placed switch vendors in an enviable position. Service providers needing these capabilities are limited in their ability to negotiate price, delivery or performance for the switched based hardware and software necessary for number portability. See also NYNEX's Further Comments in Docket 95-116, March 29, 1996, note 4.

[19] Switch vendors have had difficulty meeting their promised general availability dates for new capabilities. For example, see NorTel's announcement delaying its National ISDN 2 capabilities six months and its delay in making Original Line Number Screening and STP High Speed Link capabilities available.

[20] See Order ¶ 80.

[21] See attached letter from Paul LaCourture, Vice President - Engineering and Construction, NYNEX to Lucent Technologies detailing Lucent's lack of support in fulfilling NYNEX's orders for ISDN capabilities.

portability will represent an enormous increase in the amount of work required. If switch vendors cannot meet the current demand placed upon them, it is unlikely they will meet the installation demands number portability will place on them.

Implementing number portability will be more complex than the switch vendors have led the FCC to believe. Switch vendors have not adequately identified the work effort involved in establishing the infrastructure for number portability. End office switches remain operational during generic software upgrades. However, to minimize any potential disruptions in service, the generic software upgrades are usually performed outside of business hours on weekends. Appropriate personnel and other resources must be scheduled for these work efforts. There probably are not enough weekends between when the software becomes commercially available and when number portability needs to be made available, to accomplish these upgrades. Additionally, in claiming it could upgrade 50 switches a week to support deployment of number portability,[22] Lucent only addressed how many upgrades its manufacturing facilities could make available. It did not address the need to coordinate with the LEC nor did it address the hardware (new processors and memory) that must be added with the new software. The hardware portion of this effort is a very time-consuming, labor-intensive job that requires removing many of the old memory cards and installing new memory cards while keeping the equipment operational. Moreover, the work discussed above is at the end office level. The infrastructure for number portability must be added -- signaling links, STPs, databases, OSSs, Operator Services, etc. Switch vendors did not discuss this aspect at all. Also, for NYNEX's first and biggest MSA,

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[22] See Order ¶ 77.

New York, most of this work will be going on during the summer, the period when human resources are least available.

Furthermore, AT&T has presented a schedule for completing the MSAs. AT&T's schedule anticipated 25 switches per MSA -- 5 CLEC and 20 ILEC.[23] This is a vast underestimate of the work effort involved. The New York MSA, the first that NYNEX is required to equip, will involve approximately 150 NYNEX switches and an unknown number of CLEC switches. More importantly, this area encompasses Manhattan, the financial capital of the world and traditionally the most demanding telecommunications marketplace for proving the claims of telecommunications equipment vendors. This area, with its large number of lines,[24] is the first to be done,[25] without the benefit of any experience with the new hardware and software that will be deployed for number portability. Because of this and the significant increase in signaling load that number portability will cause (as discussed earlier), NYNEX is even more concerned about the potential impacts of number portability on network reliability.

Accordingly, number portability implementation in the 100 largest MSAs will be a huge work effort the extent of which is difficult to specifically predict at this point. No real historical

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[23] AT&T Ex Parte, April 24, 1996, Attachment 1.

[24] NYNEX's switches in New York City (NYC) average approximately 47,000 lines per switch while the rest of NYNEX averages approximately only 10,200 lines per switch. Additionally, a much higher percentage of the lines in NYC as opposed to the other areas are for business. These lines have a correspondingly higher call volume and usage than the resident lines found outside of NYC.

[25] The Commission's schedule calls for the New York MSA to be done between October 1 and December 31, 1997. As it recognized in its 800 Number Portability Proceeding, this is a busy time of year and the Commission delayed the cutover of 800 Number Portability until after the holiday season. Provision Of Access For 800 Service, 7 FCC Rcd 8616, 8621 (1992).

basis exists for comparison. The resources in terms of capital, expense, personnel, etc. are enormous and will cause many other projects to be postponed and/or canceled. However, this schedule obviously relies heavily on external factors upon which NYNEX has no control. In addition to reliance on switch vendors, these factors include the following:

B. Establishment Of NANC And Regional Databases (DBs)

The FCC should quickly establish the North American Numbering Council (NANC) as intended, or implement alternatives.[26] The NANC, once it exists, is supposed to choose an administrator that will oversee the establishment of regional DBs that will contain information on ported numbers.[27] Thus, the establishment of NANC and these DBs represent a critical path item which appears not to be on track.[28]

As an alternative, the FCC could provide more flexibility in its approach on States "opting out" of the regional DB, and encourage and/or reward States that choose to work together. In the Order, States were given the option to opt out of the regional DB if they chose to establish their own.[29] However, this was not encouraged. Some States, i.e., New York, are

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[26] The Commission's Order in CC Docket 92-237 providing for establishment of the NANC was released July 13, 1995. This Order called for the first meeting of the NANC to be held one month after approval of the charter. The NANC's charter was approved by the Office of Management and Budget in October of 1995. The Commission has yet to determine the NANC's membership. NYNEX believes it unlikely the NANC can meet its obligations under the Number Portability Order and NYNEX strongly recommends the Commission consider the alternatives discussed below.

[27] See Order ¶¶ 92-95.

[28] If the FCC cannot establish the NANC and address relevant number portability issues in a timely manner, it could request that ATIS and/or one of its subtending organizations, with a later transfer back to the NANC, address any issues of a national scope and/or requiring national coordination/resolution.

[29] See Order ¶ 95.

aggressively pursuing the establishment of their own databases at this time. The FCC could encourage States that have not yet begun number portability activities, such as those that border some of the more active States, e.g., Vermont, Massachusetts, Connecticut, to work with the more active States, i.e., New York, to establish and/or share their regional DBs and associated platforms.

C. The Illinois Field Test

The FCC has ordered the participants of the Illinois Local Number Portability Workshop to conduct a field test, ending by August 31, 1997, and deliver a report within thirty days, i.e., September 30, 1997. On the next day (October 1, 1997), NYNEX must begin implementation of number portability in the New York MSA (to be completed by December 31, 1997). Thus, as currently configured and scheduled, the Illinois field test will not provide NYNEX with assistance in meeting the mandate. Additionally, companies will need to be able to rely on the findings of their own testing and subsequently advise the FCC as appropriate. The FCC expects the field test in Illinois to encompass billing and ordering systems and maintenance agreements as well as network capabilities. However, Ameritech has indicated it will be performing many of these activities on a manual basis. This will directly impact the quality of service.

Therefore, the FCC should require that the field test and associated report be expedited and/or that the FCC fully consider, utilizing the same criteria it provided for the Illinois field test (including billing and ordering systems, maintenance agreements, etc.), the results of field tests in other areas.

IV. THE COMMISSION SHOULD FURTHER DEFINE THE REQUEST PROCESS FOR SMALLER AREAS AFTER NUMBER PORTABILITY IS DEPLOYED IN THE TOP 100 MSAs

In paragraph 80 of the Order, the Commission requires:

> After December 31, 1998, each LEC must make long-term number portability available in smaller MSAs within six months after a specific request by another telecommunications carrier in the areas in which the requesting carrier is operating or plans to operate. Telecommunications carriers may file requests for number portability beginning January 1, 1999. Such requests should specifically request long-term number portability, identify the discrete geographic area covered by the request, and provide a tentative date six or more months in the future when the carrier expects to need number portability in order to port prospective customers.

This request process needs to be defined in more detail, and the following issues need to be addressed:

As an initial matter, the six month requirement does not seem to have been developed based on any factual information. However, the following clarifications and/or requirements would assist NYNEX in meeting this directive.

First, the FCC should establish criteria for determining what constitutes a bona fide request.[30] Eliminating baseless requests will allow NYNEX to better focus on providing the capabilities where truly needed. Unnecessary requests will only divert NYNEX's attention and resources from meeting an already difficult and tight time frame, i.e., six months for satisfying requests subsequent to equipping the top 100 MSAs for number portability, and unnecessarily handicap NYNEX in a highly competitive environment.

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[30] A bona fide request process is appropriate here since NYNEX will have to expend significant resources to create a new network capability that will divert it from meeting other needs. This will not be a process of rearranging existing network capabilities nor do key terms of purchase, such as price, need to be negotiated first.

Second, new entrants should be held accountable for utilizing the capabilities they request. NYNEX's competitors could request that NYNEX equip an area for number portability but never utilize it. This would result in a waste of NYNEX's resources -- capital, expense, manpower, etc. -- that could be utilized for equipping other areas or implementing other pro-competitive initiatives.

Third, the FCC should consider "leveling" the requests for number portability after the top 100 MSAs are completed if the requested load is too excessive. It will be difficult for NYNEX to turn around a request for number portability in six months, for reasons described above. The FCC has made an attempt with the top 100 MSA schedule to evenly distribute the burden among carriers and over time. The FCC should consider a similar approach in the six month bona fide request process.

As an alternative, the Commission could utilize a process similar to that adopted in the Interconnection Proceeding for the scheduling of agreements between Class A carriers and the Independent Telephone Companies,[31] i.e., allow the States to review and provide appropriate scheduling for the remaining areas once the top 100 MSAs are complete. However, the Commission would need to maintain an appropriate oversight role in this process to ensure that the proper "leveling" occurs.

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[31] See CC Docket No. 96-98, First Report and Order, released August 8, 1996, ¶ 171.

V. CONCLUSION

The Commission should expeditiously reconsider and clarify its Number Portability Order to allow the Query On Release method on an intra-network basis because its use will facilitate NYNEX's ability to meet the deployment schedule while safeguarding network reliability. Additionally, the Commission should take the actions recommended above regarding factors beyond NYNEX's control in the deployment of number portability. These actions include: holding switch vendors accountable; establishing the NANC or supporting alternatives; and expediting the Illinois field test and/or accepting the results of field tests in other areas utilizing the same criteria as the Illinois field test. Finally, the Commission should define more specifically the request process for smaller areas after number portability is deployed in the top 100 MSAs.

Respectfully submitted,

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Dated: August 26, 1996

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NYNEX

Thursday, May 30, 1996

Mr. Michael Deeelle
VP - Lucent Regional Sales
Lucent

Mike,

It has been brought to my attention that while NYNEX and Lucent Technologies Inc. have entered into a multi-million dollar commitment through the BRI ISDN Contract, Lucent's responsiveness to NYNEX's requests concerning the deployment of this contract have been less than satisfactory. Although Lucent was initially helpful in assisting NYNEX in rolling out this agreement to field engineering groups, there have been various other instances where Lucent has not met its deadlines on follow up items.

Some of the items that have not been delivered to NYNEX are the Ordering Guide, the input symbols for the various switch modules per the contract, and the responses to the questions that have been generated both at the roll-out meetings, and as a result of the engineers writing specific jobs. These items are a month overdue, and there is no scheduled date for their delivery at this time. NYNEX Engineering is currently having to do all their designs without the benefit of this assistance from Lucent. With NYNEX having made such a large dollar commitment, I am having difficulty understanding why Lucent is not giving NYNEX outstanding service.

Additionally, there have been scheduling problems where NYNEX has lost scheduled slots for switch mod shipments that it had earmarked for ISDN, because of a misunderstanding internal to Lucent. NYNEX is also having to "swap" current ISDN slot dates to accommodate "emergency" jobs, or customer demands for service. The inability of Lucent to properly service NYNEX has caused delays in the deployment of ISDN.

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NYNEX

NYNEX must be in a position to successfully implement prior agreements before looking to address new service implementations (e.g., Primary Rate ISDN, Special Delivery Service, Two Level Call Return, Universally Activated Three Way Calling, AIN Upgrades etc.). As many of the above items are currently under negotiation, I would appreciate immediate attention to these issues so that NYNEX can assess its position relative to taking on additional implementation burdens this quarter.

P.C. Lacouture

Paul A. Lacouture
VP - NYNEX Engineering & Construction

cc: W. Shuttleworth
M. Daigle